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Pamela Grubaugh-Littig
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23 April 1991

Ref: Division Order, Bear Canyon Mine, Co-Op Mining Company,
ACT/015/025, Emery County, Utah

File #2
This letter is in response to your letter dated 11 April 1991, received 16 April 1991. Attached with this letter are 4 copies of revised pages. These pages have been adjusted following suggestions from the Division Order comments, received 7 December 1990, (ltr dated Nov 27, 1990). Additional copies of this material will be forwarded to the Division upon request.

Each of the items from the Division Order are addressed in the pages that follow. These comments and responses should satisfy any concerns that the Division may have. If a stipulated permit can be issued allowing adequate time for completion of active issues, please proceed in that manner. Be advised that additional full time personnel are actively working to close the open issues.

Thank you,

Kimly C. Mangum

Kimly C. Mangum, P.E.
Permitting & Compliance Consultant.

Enclosure(s)
cc: Co-Op Mining Co.
C.O.P. Coal Development Co.

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DIVISION OF
OIL GAS & MINING

PAGE 1

Items #1 & #2 CLOSED

Updated text submitted 21 January 1991. No follow up comments received.

Item #3 CLOSED

Plates 2-4A thru 2-4D (Surface Facilities), 7-1A thru 7-1D (Hydrology), 7-4 (Water Monitoring) and 7-5 (Watershed) were submitted to the Division on 26 Feb 1991 by Dan Guy for Co-Op. The maps were subsequently reviewed by the Division and review comments were received 21 March 1991. Plates 2-4A thru 2-4D and 7-1A thru 7-1D were updated and resubmitted 8 April 1991. Plates 7-4 and 7-5 were resubmitted 22 April 1991.

PAGE 2

Item #4 CLOSED

Results of the reconnaissance inspection, performed by the U.S. Department of Agriculture, Soil Conservation Service in Nov. 1990 was incorporated into the MRP and submitted 13 February 1991.

Item #5 ATTACHED

pg 8-ii, 8-1 Results of the Order 1, Soil Survey conducted
thru 8-11 on the entire operational area, in Nov. 1990 by the
8B-13 thru U.S. Department of Agriculture, Soil Conservation
8B-29 Service is now incorporated into the text and added
 to Appendix 8-B. Coordination with the SCS to
 obtain a quality reproduction of their survey
 information for the new soils map was just recently
 concluded by Dan Guy and Plate 8-1 is expected to
 be available for delivery to the Division within
 the next week.

Item #6 CLOSED

Updated text submitted 21 January 1991. No follow up comments received.

Item #7 CLOSED

Updated text submitted 21 January 1991. No follow up comments received.

Item #8 ACTIVE

Co-Op is in the process of generating a new Map that will better indicate soil requirements for topsoil redistribution. Co-Op has requested a written position from the Division concerning the use of substitute topsoil material as previously approved in the plan and has not as of yet received a response. Review of the newly generated maps indicates that the acreage was under estimated in earlier editions of the MRP. The operator intends on generating any additional required material from beneath the existing topsoil pile and from a new site proposed south east of the scale house. Concern as to the availability of sufficient topsoil material is not in question. Please allow for an additional 30 days (24 May 1991) to complete this matter. Any potential impacts from the Divisions position on previously approved procedures should be forwarded to Co-Op as soon as possible.

PAGE #3

Item #9 CLOSED

Updated text submitted prior to receipt of Division Order (10/90). No follow up comments received.

Item #10 CLOSED

Updated Plate 3-3 submitted prior to receipt of Division Order (10/90). No follow up comments received.

Item #11 CLOSED

Updated text submitted 21 January 1991. No follow up comments received.

Item #12 CLOSED

Updated text submitted prior to receipt of Division Order (10/90). No follow up comments received.

Item #13 CLOSED

Updated text submitted prior to receipt of Division Order (10/90).
No follow up comments received.

PAGE #4

Item 14 ACTIVE

Co-Op is in the process of generating a new Post Mining Topography (Plate 3-2) and Post Mining Drainage (Plate 7-7) Map. This is perhaps the largest of the tasks incorporated into the updating of materials required by the Division Order and is contingent on completion of all other issues. Please allow for an additional 45 days (7 June 1991) to complete the engineering required for this issue.

Item 15 ATTACHED

App 7-J Results of the Hydrogeologic Evaluation of the Bear Canyon Mine Expansion and Proposed Expansion Areas is included as Appendix 7-J to replace the old text.

Item 16 CLOSED

Updated text submitted 21 January 1991. No follow up comments received.

Item 17 ACTIVE

A few new issues concerning hydrology within the permit area were brought out with the new maps. See NOV No. N91-26-4-3. The operator is conducting new hydrologic calculations for the operation. Submittal for 30 May 1991 should be realized.

PAGE #5

Item 18 ACTIVE

See comments Item #17 and Item #14.